

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:) Case No. 18-20971-CMB
Linda C. Parker,) Chapter 11
Debtor,)
PNC Bank National Association,) Related Document No. 171-170
Movant,) Hearing Date: 12/05/19 @ 1:30 p.m.
vs.) Response Due: 11/17/19
Linda C. Parker,)
Respondent.) Document No.

RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW, comes the Debtor, Linda C. Parker, by and through her attorneys, Calaiaro Valencik, and in response to the Movant's motion for relief from stay avers as follows:

1. Admitted.
2. Admitted. By way of further response this is the Debtor's residence and it is essential for the reorganization of this debtor.
3. Admitted.
4. Denied as stated. The Debtor is unaware of the movant's wishes.
5. Admitted.
6. Denied as stated. By way of further response, the Movant has provided no accounting as to how this figure was arrived at therefore the same is denied with proof demanded.
7. Denied as stated. The Debtor has or will tender the regular monthly payments prior to the hearing scheduled int his matter. By way of further response, Debtor

believes the “additional fees” referred to in the motion are contradictory to the confirmed plan.

8. Denied as stated. These numbers do not comport with the confirmed plan. Debtor demands an accounting of this debt.

9. Admitted.

10. Admitted.

11. Admitted.

12. Admitted.

13. Denied. As previously stated, this is debtor’s residence and it is essential to this reorganization.

14. This paragraph contains a conclusion of law to which the Debtor is not required to respond under the Federal Rules of Civil Procedure. However, if a response is deemed necessary then the same is denied for the reasons set forth in the prior paragraphs. By way of further response, the Debtor disputes that the Movant has complied with the terms of the confirmed plan and given the Debtor and her attorneys proper notice and an opportunity to cure before bringing this motion.

15. This paragraph contains a conclusion of law to which the Debtor is not required to respond under the Federal Rules of Civil Procedure. However, if a response is deemed necessary then the same is denied for the reasons set forth in the prior paragraphs. By way of further response, the Debtor disputes that the Movant has complied with the terms of the confirmed plan and given the Debtor and her attorneys proper notice and an opportunity to cure before bringing this motion.

WHEREFORE, the Debtor, requests this Court deny movants requests and enforce the terms of the confirmed plan in this case as well as any other relief the Court deems appropriate.

Respectfully Submitted,

Dated: November 19, 2019

BY: /s/ David Z. Valencik
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